

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

LITTLE DIPPER DINER, et al.,

Defendant.

RECEIVED

AUG 10 2020

Case No. 3AN-20-07424CI

MOTION & MEMORANDUM FOR EXPEDITED CONSIDERATION

LITTLE DIPPER DINER et al., by and through the Law Offices of Blake Fulton Quackenbush, moves for expedited consideration of the *Motion to Continue Hearing*.

Expedited consideration is necessary because Little Dipper Diner recently hired Blake F. Quackenbush as their attorney. Because the current court date is set for 08/10/2020, there is insufficient time for Blake F. Quackenbush to properly prepare to adequately represent Little Dipper Diner in the upcoming hearing. A decision on the principal motion is needed by 08/10/2020 before 10:30 AM. This motion is supported by an affidavit and other evidence showing the facts which justify expedited consideration.¹

Undersigned counsel hereby certifies that good faith effort has been made by his office and his client to resolve the issues raised with opposing counsel, but that these efforts were unsuccessful.² The following efforts were made to resolve the issues for

¹ Alaska R. Civ. Proc. 77(g)(3).

² Alaska R. Civ. Proc. 77(g)(4).


which expedited consideration is sought;³ undersigned counsel's office attempted to call opposing counsel to discuss resolution.

As shown in the certificate of service, opposing counsel was notified of this request for expedited consideration of the principal motion via email.⁴ It was practical to notify opposing counsel via email because it was the fastest method of service.⁵

A proposed order is filed concurrently with this motion and memorandum.

DATED this 10 day of August 2020 at Anchorage, Alaska.

LAW OFFICES OF
BLAKE FULTON QUACKENBUSH
Attorney for Little Dipper Diner LLC


Ak Bar 1405035
C. BLAKE F. QUACKENBUSH, ESQ.
ALASKA BAR NO. 1405040

³ Alaska R. Civ. Proc. 77(g)(4).

⁴ Alaska R. Civ. Proc. 77(g)(5).

⁵ Alaska R. Civ. Proc. 77(g)(5).

LAW OFFICES OF BLAKE FULION QUACKENBUSH

807 G Street, Suite 100

Anchorage, Alaska 99501

Phone (907) 868-2780 | Fax (907) 885-0059

blake@BFQLaw.com

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on 08/10, 2020 a true and correct copy of this document was served by: ☒ USPS 1st Class Mail; ☒ E-Mail; ☐ Fax; ☐ Messenger; and/or ☐ Hand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov

By: 

GREGORY STEWART

Legal Assistant

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

LITTLE DIPPER DINER, et al.,

Defendant.

Case No. 3AN-20-07424CI

AFFIDAVIT OF GREGORY G. STEWART

STATE OF ALASKA)

)

ss.

THIRD JUDICIAL DISTRICT)

I, GREGORY G. STEWART, being first duly sworn, depose and state:

1. I am the legal assistant to Blake Fulton Quackenbush who is the attorney for Little Dipper Diner, in the above captioned case, and I have personal knowledge of the facts contained herein. If called upon to testify, I would do so according to the facts of this affidavit.

2. Little Dipper Diner hired our office as of 08/10/2020

3. Our office has yet to review the case file.

4. Little Dipper Diner requires expedited consideration so our office can have a chance to review the case file.

FURTHER YOUR AFFLIANT SAYETH NAUGHT.

LAW OFFICES OF BLAKE FULTON QUACKENBUSH

807 G Street, Suite 240

Anchorage, Alaska 99501

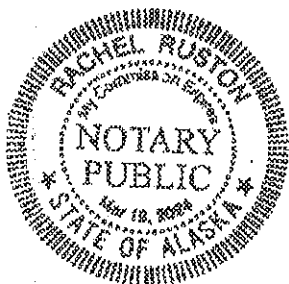
(907) 868-2780 | Fax (907) 865-0159

blake@BFQLaw.com

DATED this 10th day of August 2020 at Anchorage, Alaska.


GREGORY G. STEWART

SUBSCRIBED AND SWORN to before me by 10th day of AUGUST 2020
at Anchorage, Alaska.



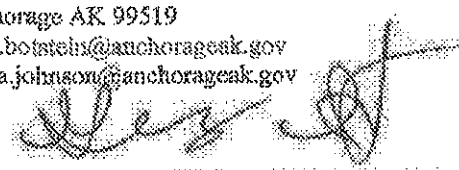

NOTARY PUBLIC in and for ALASKA

My commission expires: 03/19/2024

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on 08/10, 2020
a true and correct copy of this document was served by:
☒ USPS 1st Class Mail; ☒ E-Mail; ☐ Fax; ☐ Messenger;
and/or ☐ Hand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov


By: _____
GREGORY STEWART
Legal Assistant

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

MUNICIPALITY OF ANCHORAGE,

Plaintiff,

v.

LITTLE DIPPER DINER, et al.,

Defendant.

Case No. 3AN-20-07424CI

ORDER GRANTING MOTION FOR EXPEDITED CONSIDERATION OF
MOTION TO CONTINUE

IT IS ORDERED that the Motion for Expedited consideration is hereby Granted.

The Municipality of Anchorage will have until _____ to respond and Little

Dipper Diner shall have until _____ to respond.

ENTERED this _____ day of _____, 2020 at Anchorage, Alaska.

HONORABLE WILLIAM MORSE
SUPERIOR COURT JUDGE

LAW OFFICES OF BLAKE FULTON QUACKENBUSH
807 G Street, Suite 100
Anchorage, Alaska 99501
(907) 863-2780 (Office) | (907) 885-0059 (Fax)
blake@BFQLaw.com

LAW OFFICES OF BLAKE FULTON QUACKENBUSH
807 G Street, Suite 100
Anchorage, Alaska 99501
(907) 868-2780 (Office) | (907) 885-0059 (Fax)
blake@BFQ1aw.com

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on 08/10, 2020 a true and correct copy of this document was served by: ☒ USPS 1st Class Mail; ☒ E-Mail; ☐ Fax; ☐ Messenger; and/or ☐ Hand Delivery to the following recipient(s):

Attn: Ruth Botstein
Attn: Linda Johnson
Municipal Attorney's Office
PO Box 196650
Anchorage AK 99519
Ruth.botstein@anchorageak.gov
Linda.johnson@anchorageak.gov

By: 

GREGORY STEWART
Legal Assistant